

REMARKS

Initially, Applicants would like to thank the Examiner Brian Goddard and the Supervisory Examiner Safet Metjahic for conducting a personal interview with Applicants' representatives Dhiren Odedra and Yoshinobu Idogawa on June 23, 2004, at the U.S. Patent and Trademark Office. Although no representatives from the undersigned firm were present at this interview, it has been represented to us by those in attendance that Applicants set forth arguments distinguishing the claimed invention, as particularly recited in a newly proposed independent claim (presented during the interview), over the Examiner's reference applied under 35 U.S.C. § 102(b), U.S. Patent No. 5,991,798 to OZAKI et al. During the interview, the Examiner indicated that the newly proposed independent claim appeared to distinguish over the OZAKI et al. reference, although further consideration and search would be required. Accordingly, each of the newly submitted independent claims in the present Reply includes the features recited in the independent claim presented during the interview.

Upon entry of the present amendment, claims 1-19 will have been canceled, without prejudice and without disclaimer of the subject matter. New claims 20-41, which reflect the issues addressed during the above-mentioned interview and more clearly define the claimed embodiment of the invention, will have been submitted for the Examiner's consideration. By submitting these claims, Applicants do not intend to acquiesce in the Examiner's rejection or to the applicability of the cited prior art, but rather intend merely to expedite prosecution of the present application. Applicants respectfully submit that all pending claims are now in condition for allowance.

In the above-referenced Official Action, the Examiner rejected claims 1-19 under 35 U.S.C. § 102(b) as being anticipated by OZAKI et al. (U.S. Patent No. 5,991,798). Applicants respectfully traverse this rejection, at least for the reasons discussed in the personal interview of June 23, 2004, which are summarized below.

In the prior art, when contents are distributed to a recording medium, the file names of the distributed content in package files are changed to names that do not take into account reference file names, thereby disabling link destination specification. Accordingly, an object of the present invention is to enable links to be maintained when distributed contents are recorded on a recording medium in packages of files. *See, e.g.*, Specification, para. [0012]. Generally, the object of the OZAKI et al. differs substantially from that of the claimed invention. OZAKI et al. intend to allow a user to “mixedly” display data obtained from various means (*e.g.*, web server, CD-ROM, e-mail, telephone line, e-mail, and the like) on a single display screen, as opposed to maintaining and recording links among distributed contents. *See, e.g.*, Abstract; Fig. 1.

In the above-mentioned Official Action, the Examiner incorrectly asserted that various elements described by OZAKI et al. teach aspects of the claimed invention. For example, the Examiner asserted that the “package medium” described by OZAKI et al. teaches “package,” as used in the present application. The “package medium” of OZAKI et al. refers to types of recording mediums, such as CD-ROMs or DVD-ROMs. *See, e.g.*, col. 9, lines 11-13. In contrast, “package” as used herein relates to data files, as recited in newly submitted independent claims 20, 24, 27, 30, 33, 36 and 39-41. The claimed embodiment includes a recording medium that has distributed content recorded thereon in packages of files. A directory for each package is created and a file of content included

in a package is recorded under the directory. The packages contain data, such as a day's worth of newspaper articles written in HTML format with accompanying image and/or audio files. *See, e.g.*, Fig. 2; paras. [0047]-[0048]. This differs substantially from the package medium of OZAKI et al.

The Examiner also incorrectly asserted that the "disk link management table" described by OZAKI et al. teaches the "content file group management file," as recited in the newly submitted independent claims. The disk link management table 70 of OZAKI et al. merely manages a corresponding relationship between a URL and a particular package medium 3 (*e.g.*, CD-ROM or DVD-ROM), in which the information specified by the URL is stored. *See* col. 10, lines 53-58; Fig. 7. OZAKI et al. do not teach or suggest managing a correspondence between a content number of a file of content and a reference name when the content is linked to other content, as recited in the newly submitted independent claims. As a result, link information is maintained even when distributed contents are recorded on a recording medium in packages of files. Thus, it is evident that the disk link management table disclosed in OZAKI et al. does not teach or suggest the features of the content file group management file of the present application.

Accordingly, since OZAKI et al. do not disclose each and every element of the claimed embodiment of Applicants' invention, withdrawal of the rejections under 35 U.S.C., § 102(b) based on OZAKI et al. is respectfully requested.

With regard to claims 21-23, 25-26, 28-29, 31-32, 34-35 and 37-38, Applicants assert that they are allowable at least because they depend, directly or indirectly, from independent claims 20, 24, 27, 30, 33 and 36, respectively, which Applicants submit have been shown to be allowable.

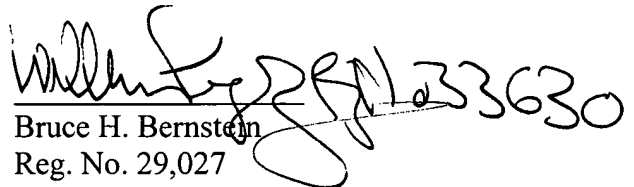
Further, the dependant claims are allowable on their own merits. For example, as discussed in the interview, dependent claims 21, 25, 28, 31, 34 and 37 recite that, when a package has content linked to content included in another package, a link resolution file, recorded on the recording medium, is used to manage a correspondence between a reference name indicating the content included in the other package and a package identifier of the other package. The Examiner asserted that the “cache management table” described in OZAKI et al. teaches the “link resolution file” of the claimed invention. Applicants respectfully submit that the cache management table 50 disclosed in OZAKI et al. is stored in the terminal, not on the recording medium, as claimed in the present application. *See* col. 10, lines 30-31. Thus, OZAKI et al. do not teach or suggest a link resolution file, as particularly recited in each of dependent claims 21, 25, 28, 31, 34, and 37.

In view of the herein contained amendments and remarks, Applicants respectfully request reconsideration and withdrawal of previously asserted rejection set forth in the Official Action of February 11, 2004, together with an indication of the allowability of all pending claims, in due course. Such action is respectfully requested and is believed to be appropriate and proper.

Any amendments to the claims in this Reply, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Examiner have any questions concerning this Amendment or the present application, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully Submitted,  
Takashi SHIMOJIMA et al.

  
Bruce H. Bernstein  
Reg. No. 29,027

August 4, 2004  
GREENBLUM & BERNSTEIN, P.L.C.  
1950 Roland Clarke Place  
Reston, VA 20191  
(703) 716-1191